

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CD INTELLECTUAL PROPERTY  
HOLDINGS, INC.,

Plaintiff,

C.A. No. 1:05-00414 (JJF)

v.

AMAZON.COM, INC.,

Defendant.

**DECLARATION OF WENDY BJERKNES IN SUPPORT OF  
AMAZON.COM'S OPPOSITION TO MOTION COMPEL  
SUPPLEMENTAL INTERROGATORY ANSWERS**

I, Wendy Bjerknes, declare as follows:

1. I am an attorney with the law firm of Fenwick & West LLP, counsel to Amazon.com, Inc. and have been granted permission to appear *pro hac vice* in this action. I make the following statements based upon my personal knowledge or on information and belief, and, if called upon to testify, would testify competently to the matters contained herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of a letter to Elizabeth A. Leff, Esq., dated February 8, 2006.

3. Attached hereto as **Exhibit B** is a true and correct copy of a letter to Elizabeth A. Leff, Esq., dated February 21, 2006.

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter to Elizabeth A. Leff, Esq., dated February 24, 2006.

5. Attached hereto as **Exhibit D** is a true and correct copy of a letter to C. Nicole Gifford, Esq., dated February 28, 2006.

6. Attached hereto as **Exhibit E** is a true and correct copy of a letter to C.

Nicole Gifford, Esq., dated March 8, 2006.

7. Attached hereto as **Exhibit F** is a true and correct copy of a letter to Elizabeth A. Leff, Esq. and C. Nicole Gifford, Esq., dated March 20, 2006.

8. Attached hereto as **Exhibit G** is a true and correct copy of a letter to Wendy L. Bjerknes, Esq., dated March 13, 2006.

9. Attached hereto as **Exhibit H** is a true and correct copy of a letter to Wendy L. Bjerknes, Esq., dated February 27, 2006.

10. Attached hereto as **Exhibit I** is a true and correct copy of a letter to Wendy L. Bjerknes, Esq., dated January 26, 2006.

11. Attached hereto as **Exhibit J** is a true and correct copy of a letter to Wendy L. Bjerknes, Esq., dated February 22, 2006.

12. Attached hereto as **Exhibit K** is a true and correct copy of DEFENDANT AMAZON.COM'S RESPONSE TO PLAINTIFF CD INTELLECTUAL PROPERTY HOLDINGS LLC'S FIRST SET OF INTERROGATORIES.

13. Attached hereto as **Exhibit L** is a true and correct copy of CD'S RESPONSES TO AMAZON'S FIRST SET OF INTERROGATORIES.

14. Attached hereto as **Exhibit M** is a true and correct copy of letter to Patrick E. Premo, Esq., dated March 17, 2006.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on the 22nd day of March, 2006, at Mountain View, California.



Wendy L. Bjerknes

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